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April 2, 2024

VIA ECF

United States Magistrate Judge Hon. James Cho
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: **EDNY Civil Action No. 1:21-cv-06573-MKB-JRC**
Flux Drive, Inc. Impact Engineering, Inc., Tri Tech Manufacturing LLC, and Philip
Corbin III vs. Magnetic Drive Development and Venture LLC, NY Magnetic Drive LLC,
Pi Capital Partners LLC, James Tung Pi a/k/a James Pi, and Katy Pi

LETTER MOTION FOR SECOND EXTENSION OF TIME FOR EXPERT DISCOVERY

Dear Honorable James R. Cho:

Pursuant to the Court's Order dated February 5, 2024, which granted the plaintiffs' Motion for Extension of Time to Complete Discovery (First for Only Expert Discovery) as documented in Docket #33, and with the consent of both parties involved, the current deadline to complete all discovery activities, including expert depositions, has been set for April 4, 2024. This letter serves as the second request for an extension of time for the expert discovery.

With the agreement of both parties, and to facilitate the preparation and generation of further expert reports addressing both technological aspects and economic analyses concerning future losses, we respectfully request that the Court extend the expert discovery deadline from April 4, 2024, to July 4, 2024.

As per the Court's order dated February 5, 2024 (Docket #33), a telephone conference is scheduled for April 11, 2024. We defer to the Court's discretion regarding any potential adjustments to this scheduled conference date in light of the requested extension.

I have conferred this request for extension of time for expert's discovery with plaintiff's counsel. Plaintiffs' counsel has consented to this request for extension of time for expert discovery.

Respectfully,

A handwritten signature in blue ink, appearing to read "Kevin K. Tung", with a horizontal line drawn above the signature.

Kevin K. Tung

Copy served via CM/ECF:
Steven J. Miller, Esq., Plaintiffs' Counsel